

*Docket Rm  
Alisa  
Dennis  
Pam  
Larry  
Mark*

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF DELAWARE RECEIVED**

IN THE MATTER OF APPLICATION OF )  
DELMARVA POWER AND LIGHT )  
COMPANY INTEGRATED RESOURCE )  
PLAN FOR 2013 (FILED ON )  
FEBRUARY 22, 2013) )

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PSC DOCKETED IN DELAWARE P.S.C.  
ORDER No. 8259

**PETITION FOR INTERVENTION  
OF DELAWARE CHAPTER OF THE SIERRA CLUB**

The Delaware Chapter of the Sierra Club ("Sierra Club"), pursuant to § 2.9 of the Public Service Commission's General Rules, 26 Del. Code Regs. 1000 1001-3, § 2.9, hereby petitions the Commission for leave to intervene in this matter, and in support thereof states as follows:

1. Delmarva Power & Light Company ("DP&L") is a public utility subject to the jurisdiction of this Commission that provides electric and natural gas distribution and supply services within this State. On December 6, 2012, DP&L filed with this Commission an Integrated Resource Plan ("IRP") that is the subject matter of this proceeding and docket.

2. The Sierra Club is the proposed intervener. Pursuant to § 2.9.1.1 of the Commission's regulations, the identifying information for the Sierra Club is as follows:

The address of the Delaware Chapter of the Sierra Club is:

100 West 10th Street  
Suite 106  
Wilmington DE 19801  
302-351-2776  
delaware.chapter@sierraclub.org

The Sierra Club will be represented in this matter by:

Andrew R. Groff  
503 Rothbury Rd  
Wilmington, DE 19803  
(302) 476-9500  
andrewgroff@verizon.net

Executive Committee Member, Delaware Chapter of the Sierra Club

3. Pursuant to § 2.9.1.2 of the Commission's regulations, the Sierra Club's interest in the outcome of this proceeding is as follows:

(a) The Sierra Club is a nonprofit environmental protection organization which, among other things, seeks to educate the public in the State of Delaware about energy issues and to advocate for environmentally sound energy and resource policies to promote a sustainable economy and lifestyle within this State. The Sierra Club has 1,670 members in Delaware, who are vitally concerned about the environmental and health impacts and implications of power generation and planning within the State of Delaware.

(b) The Commission's regulations, at 26 Del. Code Regs. 3000 3010 §1.1, specifically requires that the IRP for Delmarva Power & Light should "ensure a cost effective, price stable, reliable, efficient and environmentally sound energy supply for all Standard Offer Service ("SOS") customers."

(c) The environmental impacts (and, hence, "environmental soundness") of the Delmarva IRP is of critical importance to the Sierra Club and its members. The Sierra Club seeks to intervene to ensure that the IRP reflects careful consideration of environmental impacts and planning to ensure that those impacts are both fully accounted for and taken into account in the IRP.

4. Pursuant to 26 Del. Code Regs. 1000 1001-3 §2.9.1.3, the interests of the Sierra Club and its members will not be adequately represented by the parties to this proceeding. The Sierra Club brings a unique perspective of its members, many of whom are also customers of DP&L.

5. Pursuant to 26 Del. Code Regs. 1000 1001-3 §2.9.1.3, the Sierra Club's participation in this proceeding is in the public's interest. Not only will the Sierra Club provide the unique perspective of its members, but it will also provide an additional and unique view of the environmental impacts and soundness of the IRP to the proceeding. Given the large environmental costs and benefits involved, it is in the public's interest to have a wide range of viewpoints be considered in the evaluation of the IRP, particularly when a significant new consideration has been introduced to the proceedings.

6. Pursuant to 29 Del. C. § 8716, the mission of the Public Advocate is to "advocate the lowest reasonable rates for consumers, consistent with the maintenance of adequate utility service and consistent with an equitable distribution of rates among all classes of consumers." The Public Advocate does not advocate for reducing harmful air emissions, even when such emissions create a significant economic burden on the citizens of Delaware.

7. The draft IRP includes a calculation of the value of the benefits of renewable energy policies and programs for Delaware residents of \$1.8 billion to \$4.3 billion (roughly \$2,000 to \$4,750 per resident) in avoided health and mortality costs over a ten year period. The Sierra Club is qualified to represent the public's interest in ensuring that the IRP fully accounts for all environmental and health costs and benefits that affect the citizens of Delaware.

THEREFORE, the Delaware Chapter of the Sierra Club respectfully requests that this Commission grant the following relief:

1. Grant this Petition to Intervene; and
2. Allow the Delaware Chapter of the Sierra Club to participate as a party, including having the right to address the Commission and the Senior Hearing Examiner, make comments written and oral, file motions and other pleadings, and to take other lawful actions allowed to parties under the Commission's rules as deemed appropriate.

Respectfully submitted,

Delaware Chapter of the Sierra Club

By: Andrew Groff

Date: February 21, 2013

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